

**FRANCIS L. O'REILLY**

*ATTORNEY AT LAW*

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November 1, 2023

**VIA ECF**

Honorable Kenneth M. Karas  
U.S. District Court Judge  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601

Re: *United States v. Kadjo Kondon, et al.*, 17-cr-566 (KMK)

Dear Judge Karas:

I write, respectfully, pursuant to the Criminal Justice Act, to request the appointment of associate counsel to assist in the above referenced case. Specifically, I am requesting the appointment of Diane Ferrone, Esq. at an hourly rate of \$125 (the presumptive associate rate for someone with Ms. Ferrone's experience), with approval of 100 hours. Ms. Ferrone has been appointed associate counsel on numerous CJA cases in the Southern District of New York.

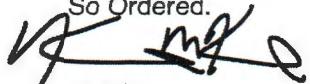
Mr. Kondon is charged with one count of conspiracy to commit bank fraud, pursuant to 18 U.S.C. Section 1349; one count of aggravated identity theft, pursuant to 18 U.S.C. Section 1028A(a)(1); and one count of conspiracy to unlawfully transfer, possess, or use a means of identification, pursuant to 18 U.S.C. Section 1028(f).

If appointed, Ms. Ferrone would assist with, among other things, reviewing the discovery, researching legal issues for potential motions, investigating the relevant factual background and defenses, drafting motions, and preparing for Mr. Kondon's defense at trial.

I am conscious of the importance of preventing the needless expenditure of CJA funds. Consistent with the goals of conserving resources, I believe the appointment of Ms. Ferrone in this case will result in savings by relieving me from performing tasks that would be more expensive due to my higher bill rate.

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Granted. Ms. Ferrone is also appointed as CJA counsel, but not because Mr. O'Reilly is not worth every penny of his services.

So Ordered.  
  
11/1/23

Respectfully submitted,

/s Francis L. O'Reilly

Francis Lee O'Reilly